

EXHIBIT O

Kappler, David

From: Michael Goldstein <mg@martinmcmahonlaw.com>
Sent: Thursday, February 22, 2018 5:30 PM
To: Haefele, Robert
Subject: EXTERNAL-Jelaidan OFAC License
Attachments: Jelaidan OFAC License.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr. Haefele:

Attached please find a copy of Wael Jelaidan's OFAC license. Let me know if there are any issues with it.

Best,

--
Michael Goldstein, Esq.
Litigation Associate
Martin F. McMahon & Associates
1150 Connecticut Ave., N.W., Suite 900
Washington, D.C. 20036
Tel: (202) 862-4343
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Admitted in VA, pending in DC

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***** IRS Circular 230

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DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

LICENSE No. SDGT-2016-330016 -1

GLOBAL TERRORISM SANCTIONS REGULATIONS
LICENSE

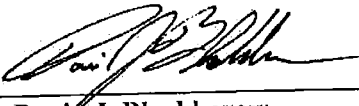
(Granted under the authority of 50 U.S.C. §§ 1601-1651, 1701-06, 22 U.S.C. § 287c, Executive Order 13224, and 31 C.F.R. Parts 501 and 594.)

To: **Wael Jelaidan**
c/o Martin F. McMahon & Associates
1150 Connecticut Ave., NW
Washington, DC 20036
Attn.: Martin F. McMahon, Esq.

1. Based on your requests dated April 8, 2016, June 13, 2016, November 1, 2016, May 18, 2017, June 19, 2017, July 25, 2017, and December 7, 2017, to the Office of Foreign Assets Control (the "Application") the transactions and activities delineated herein are hereby authorized.
2. This License is subject to the condition, among others, that the Licensee(s) comply with its terms and with all regulations, rulings, orders, and instructions issued under one or more of the authorities cited above.
3. This License **expires upon the completion of the authorized transactions or on January 31, 2019**, whichever comes first, and is not transferable. The transactions described in this License are subject to the authorities cited above and any regulations and rulings issued pursuant thereto. This License may be revoked or modified at any time. If this License was issued as a result of willful misrepresentation it may be declared void from the date of its issuance or from any other date.
4. This License does not authorize transactions prohibited under any law or regulation (including reporting requirements) administered by the Office of Foreign Assets Control other than those listed above.
5. This License does not excuse the Licensee(s) from the need to comply with any law or regulation (including reporting requirements) administered by any other agency or the need to obtain any required authorization(s) from any other agency.

Issued on behalf of the Secretary of the Treasury:

OFFICE OF FOREIGN ASSETS CONTROL

By 
David J. Blackborow
Assistant Director for Licensing

January 30, 2018
Date

Attention is directed to 18 U.S.C. § 1001, 50 U.S.C. § 1705, and 31 C.F.R. § 594.701 for provisions relating to penalties.

License No. SDGT-2016-330016-1

Page 2 of 2

SECTION I – AUTHORIZATION: (a) As described in the Application, and subject to the conditions and limitations set forth herein, Wael Jelaidan (the “Licensee”) is hereby authorized take all necessary actions to release and transfer funds from sources as described in subsection (b) hereof held in the name of the Licensee to pay Court Ordered attorney fees and expenses to Anderson Kill & Olick, P.C., Cozen O’Connor, P.C., and Motley Rice, LLC, as ordered by Magistrate Judge Frank Maas in the U.S. District Court for the Southern District of New York. See Memorandum Opinion, at 38-39, 43, 44 (Oct. 28, 2015) (ECF No. 3087):

Law Firm	Fees	Fee Award	Expenses	Total
Anderson Kill & Olick, P.C.	\$0.00	\$3,448.54	\$0.00	\$3,448.54
Cozen O’Connor, P.C.	\$90,600.00	\$3,448.54	\$978.50	\$95,027.04
Motley Rice, LLC	\$29,964.38	\$3,448.54	\$2,731.97	\$36,144.89

(b) Payments authorized by this License must not originate from a source within the United States, or from any source outside the United States within the possession or control of a U.S. person, or from any entity or individual, other than Wael Jelaidan, whose property or interests in property are blocked pursuant to any statute, Executive order, or Chapter V of Title 31 of the C.F.R. Such sources may include Faisal Finance (Switzerland) S.A. Account Number [REDACTED] 0409.

(c) Any transfers of funds through the U.S. financial system pursuant to the authorization set forth above should reference the number of this license to avoid the blocking or rejection of the transfer.

SECTION II – WARNINGS: (a) This License does not authorize the transfer of any blocked property, the debiting of any blocked account, the entry of any judgment or order that effects a transfer of blocked property, or the execution of any judgment against property blocked pursuant to any Executive order, statute, or 31 C.F.R. Chapter V.

(b) Except as authorized in Section I, this License does not authorize the direct or indirect transfer of funds or services to or from any individual, entity, person or group whose property or interests in property are blocked pursuant to any Executive order or statute, or 31 C.F.R. chapter V.

(c) The authorization set forth in this License applies only to laws and regulations administered by the Office of Foreign Assets Control, and should not be interpreted to excuse the Licensee from compliance with other laws, regulations, orders, or rulings to which it may be subject.

(d) The authorization set forth in this License applies only to laws and regulations administered by the Office of Foreign Assets Control, and should not be interpreted to excuse the Licensee from compliance with other laws, regulations, orders, or rulings to which it may be subject.

SECTION III – RECORDKEEPING AND REPORTING REQUIREMENTS: The Licensee is subject to the recordkeeping and reporting requirements of, *inter alia*, 31 C.F.R. §§ 501.601 and 501.602, including the requirement to maintain full and accurate records concerning the transactions undertaken pursuant to this License for a period of five years from the date of each transaction.

SECTION IV – PRECEDENTIAL EFFECT: The authorization contained in this License is limited to the facts and circumstances specific to the Application.
